

Toby S. Soli Tel 212.801.3196 solit@gtlaw.com

November 9, 2023

VIA ECF

The Honorable Victor Marrero United States District Court Judge Southern District of New York 500 Pearl Street New York, New York 10007

Re: Baliga v. Link Motion Inc. et al., 1:18-cv-11642 (S.D.N.Y.) (VM) (VF):

Motion to Request a Mediation Referral Order Pursuant to Local Civil Rule 83.9

Dear Judge Marrero:

Undersigned counsel writes on behalf of Plaintiff Wayne Baliga ("Baliga") to request that the Court enter a Mediation Referral Order pursuant to Local Civil Rule 83.9 of the United States District Court for the Southern District of New York.

Given the present status of the case and the precarious status of Link Motion Inc. in the Cayman Islands, Baliga believes that this would be an appropriate time to refer this case for mediation to the Court-annexed Mediation Program with the understandings that any such mediation would be governed by Local Civil Rule 83.9 of the United States District Court for the Southern District of New York and that such a mediation would not have any effect on scheduling without further leave of this Court.

Respectfully submitted,

GREENBERG TRAURIG, LLP

By: /s/ Toby S. Soli
Toby S. Soli
One Vanderbilt Avenue
New York, New York 1017
Telephone: (212) 801-9200
Email: solit@gtlaw.com

Counsel for Plaintiff

cc: All counsel of record (via ECF)